

EXHIBIT J

**IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA
GENERAL JURISDICTION DIVISION**

13 - 6680 CA 4

JOHN L. STEELE,

Plaintiff,

v.

**PAUL GODFREAD, ALAN COOPER and
JOHN DOES 1-10,**

Complaint

Jury Trial Demanded

Defendants.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff John L. Steele ("Plaintiff"), by and through his undersigned counsel, hereby files this Complaint requesting damages, injunctive relief, and other relief, and alleges as follows:

NATURE OF THE ACTION

1. Plaintiff files this action seeking monetary and punitive damages, injunctive relief and other such remedies that the Court may find just and equitable, arising out of the Internet-based conduct of a number of individuals, all but two of whom Plaintiff knows only by the anonymous, salacious, false and libelous comments they have made, and continue to make, about him on the Internet. Shielded by unconventional pseudonyms, the two named Defendants and the Doe Defendants belong to a community of Internet "commentators"—fearful of being identified—who have falsely accused Plaintiff of, among other things, criminal offenses; want of integrity in the discharge of employment; lack of ability in his profession; and the commission of fornication and adultery.

2. The Doe Defendants' defamatory statements are, of course, made under the most cowardly of circumstances: plastered over centralized Internet communicates, and available to

anyone in the world with an Internet connection, these Defendants have libeled Plaintiff under the guise of such childish and unsophisticated pseudonyms as "die troll die." The defamatory statements that they have made about Plaintiff are the type that, if made under the light of day, would prompt loved ones to suggest (or intervene and force) intensive psychological therapy. But sheltered in a cloak of cowardly pseudonyms, emboldened by association others apparently sharing the same afflictions, Defendants have continued unabated in their conduct, falsely accusing Plaintiff of many things with the stated intention of harming his business, harming his relationships with clients, harming his reputation, and harming the public reputation of anyone performing work on behalf of Plaintiff.

3. Defendants have published copious volumes of such false statements to many third parties, theoretically extending to every person on Earth through the Internet. Their false statements constitute libel per se, and are actionable without proof of special damages. Their conduct also makes them liable to Plaintiff on several theories of tort liability, including intentional interference with actual and prospective business relationships, as well as conspiracy to commit those torts.

4. Plaintiff brings this action to force Defendants out of their hiding places, to expose the "writers" to the light of day, to enjoin their continued tortious conduct against Plaintiff, and to recover the substantial damages that they have caused Plaintiff. As noted by the Florida Court of Appeals in *Lanwood Medical Center v. Sadow*:

Florida's unusually high protection of personal reputation derives from the common consent of humankind and has ancient roots. It is highly valued by civilized people. Our state constitution and common law powerfully support it. This is a value as old as the Pentateuch and the Book of Exodus, and its command as clear as the Decalogue: "Thou shall not bear false witness against thy neighbor." The personal interest in one's own good name and reputation surpasses

economics, business practices or money. It is a fundamental part of personhood, of individual standing and one's sense of worth.¹

As set forth more fully below, Plaintiff's good name has been irreparably tarnished by the Defendants' malicious conduct, which was facially motivated by ill will, hostility, and intent to harm Plaintiff. Plaintiff herein seeks redress for these harms.

THE PARTIES

5. Plaintiff is an individual residing in the State of Florida. Plaintiff is an attorney who, for nearly a decade, has litigated a wide array of complex legal issues, ranging from family law to intellectual property law. Plaintiff's legal services have been highly sought after by both individuals and entities. Throughout the course of Plaintiff's varied legal career, in which he has represented parties litigating highly contentious issues, Plaintiff has *never* been the subject of negative disciplinary action by a court or bar association.

6. Defendant Paul Godfread is an attorney who, upon information and belief, practices at 100 S. Fifth Street, Suite 1900, Minneapolis, Minnesota. Defendant Godfread is a major contributor and participant in the Internet community that is the primary source of the defamatory statements described herein. Defendant Godfread has made both written and oral statements to Plaintiff and its agents that are libelous and slanderous with respect to Plaintiff. Plaintiff has observed that those statements have appeared, or been incorporated, in comments on the Internet sites referenced herein. Among other things, Defendant Godfread has falsely accused Plaintiff both verbally and in writing of committing crimes, fraud and other matters that, when he wrote and published them to third parties, constitute defamation *per se*. Upon information and belief, and based upon the fact that statements Godfread has made to Plaintiff have appeared in substantially the same form in Internet postings that are libelous to Plaintiff and

¹ *Lamwood Medical Center Inc. v. Sadow*, 43 So. 3d 710, (Fl. Ct. App. 2010)

referenced herein, Godfread is a participant in the community of anonymous Internet posters who have defamed and committed other tortious acts against Plaintiff. Furthermore, Godfread has made allegations in a complaint filed in the District Court for the Fourth Judicial District of Minnesota that are patently false. Yet, certain false and defamatory statements from that Complaint appeared on Internet sites referenced herein long before the Complaint was ever a matter of public record. As a consequence, and upon information and belief, Godfread published false and defamatory statements about Plaintiff to members of the community referenced herein, long before his Complaint was ever a matter of public record. As such, the statements, made outside of any valid legal proceeding, are not subject to immunity from liability that otherwise attaches to statements in Court documents.

7. Defendant Alan Cooper is an individual residing in Mille Lacs County, Minnesota. Defendant Cooper is a client of Defendant Godfread. Godfread represented to Plaintiff that certain of the false and defamatory statements referenced in Paragraph 6 derived from information provided to him by Cooper. As such, Cooper's false statements, when published to third parties, constitute defamation *per se*. Upon information and belief, and based upon the fact that false statements about Plaintiff attributed to Cooper have appeared in substantially the same form in Internet postings that are libelous to Plaintiff and referenced herein, Cooper is a participant in the community of anonymous Internet posters who have defamed and committed other tortious acts against Plaintiff.

8. Defendants Does 1 through 10 are individuals whose actual names are unknown to Plaintiff. Instead, they are known to Plaintiff only by the childish and unsophisticated --- yet often exceedingly angry --- pseudonyms they hide behind while falsely conversing in writing about Plaintiff on the Internet.

9. Plaintiff has observed Defendants and others libeling him on the Internet. Several examples of the actionable conduct of Defendants are set forth below and in the attachments to this Complaint. Plaintiff intends to obtain Defendants' identities in discovery, at which time Plaintiff, if necessary, will seek leave of the Court to amend this Complaint to identify additional Defendants and additional claims.

JURISDICTION AND VENUE

10. Pursuant to FL ST § 48.193, this Court has personal jurisdiction over Defendants because, upon information and belief, Defendants either reside in, or committed tortious acts in, Miami-Dade County, Florida.

11. Venue in this county is proper pursuant to FL ST § 47.011 because, upon information and belief, some or part of the transactions described herein occurred in this county and, upon information and belief, one or more of the Defendants reside in this county.

POTENTIAL INCLUSION OF OTHER DEFENDANTS

12. Plaintiff may elect, after learning additional facts, to seek leave of the Court to amend this complaint to include other individuals as defendants in this action

BACKGROUND

13. Plaintiff is an attorney residing in the State of Florida. He has served as a trusted advisor in a diverse array of legal matters. Plaintiff's practice of copyright law, however, has inspired an absurd degree of vitriol from the previously described community of anonymous Internet commentators. Plaintiff's practice of copyright law involved pursuing civil litigation on behalf of several companies whose copyrighted works were infringed upon by individuals via the Internet. Relatedly, Plaintiff also represented clients who were victims of computer hacking.

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**COPYRIGHT INFRINGEMENT CASES ARISING FROM
USE OF THE BITTORRENT PROTOCOL**

14. Federal law, under the purview of 17 U.S.C. § 101 et. seq. (commonly referred to as “the Copyright Act”), provides protection to individuals and entities who own the copyrights to, *inter alia*, audiovisual works. The purpose of the Copyright Act is to ensure that the owners of copyrights are able to effectively enforce their rights in the face of infringement. The Copyright Act provides for statutory damages of up to \$150,000 for an act of infringement. See 17 U.S.C. § 504(c)(2). In providing for such a remedy, the Copyright Act facially demonstrates strong congressional intent to curb copyright infringement. The United States, as the world’s foremost provider of audiovisual works, faces unique issues with respect to infringement of the rights underlying such works. The Copyright Act, though by no means perfectly constructed, nevertheless provides copyright owners with the tools necessary to protect and profit from their works—as they rightfully should.

15. Copyright infringement has faced a unique challenge with the advent of the Internet, which has made virtually unlimited amounts of information and data readily available to whomever wishes to access it. One of the methods by which this information and data is readily available is the BitTorrent protocol. BitTorrent is a modern file sharing method used for distributing large amounts of data via the Internet in an efficient, reliable fashion. Though there are several *potentially* legitimate uses for BitTorrent, the overwhelming majority of those who use the protocol do so to access for free that which should be paid for—movies, television shows, music, software, and even books.

16. The advent of BitTorrent, specifically, has created new issues for those wishing to protect their copyrights. Traditional file transfer protocols involve a central server, which distributes data directly to individual users. This method is prone to collapse when large numbers of users

request data from the central server, in which case the server can become overburdened and the rate of data transmission can slow considerably or cease altogether. In addition, the reliability of access to the data stored on a server is largely dependent on the server's ability to continue functioning for prolonged periods of time under high resource demands.

17. Standard Peer-to-Peer ("P2P") protocols involve a one-to-one transfer of whole files between a single uploader and single downloader. Although standard P2P protocols solve some of the issues associated with traditional file transfer protocols, these protocols still suffer from such issues as scalability. For example, when a popular file is released (e.g. an illegal copy of the latest blockbuster movie) the initial source of the file performs a one-to-one whole file transfer to a third party, who then performs similar transfers. The one-to-one whole file transfer method can significantly delay the spread of a file across the world because the initial spread is so limited.

18. BitTorrent, on the other hand, resolves many of the issues with seamless file transfer that exist in traditional file transfer or P2P protocols, as described in paragraphs 16 and 17. The BitTorrent protocol is a decentralized method of distributing data. Instead of relying on a central server to distribute data directly to individual users, the BitTorrent protocol allows individual users to distribute data among themselves. Further, the BitTorrent protocol involves breaking a single large file into many small pieces, which can be transferred much more quickly than a single large file and in turn redistributed much more quickly than a single large file. Moreover, each peer can download missing pieces of the file from multiple sources—often simultaneously—which causes transfers to be fast and reliable. After downloading a piece, a peer automatically becomes a source for the piece. This distribution method contrasts sharply with a one-to-one whole file transfer method.

19. In BitTorrent vernacular, individual downloaders/distributors of a particular file are called peers. The group of peers involved in downloading/distributing a particular file is called a swarm. A server which stores a list of peers in a swarm is called a tracker. A computer program that implements the BitTorrent protocol is called a BitTorrent client. Each swarm is unique to a particular file.

20. The degree of anonymity provided by the BitTorrent protocol is extremely low. Because the protocol is based on peers connecting to one another, a peer must broadcast identifying information (i.e. an IP address) before it can receive data. Nevertheless, the actual names of peers in a swarm are unknown, as the users are allowed to download and distribute under the cover of their IP addresses.

21. As described above, the BitTorrent protocol is very efficient, and as such, it is an extremely popular method for transferring data. The size of swarms for popular files can reach into the tens of thousands of unique peers. A swarm will commonly have peers from many, if not every, state in the United States and several countries around the world. And every peer in the swarm participates in distributing the file to dozens, hundreds, or even thousands of other peers.

22. Despite the potential for legitimate use, the overwhelming majority of activity on BitTorrent consists of unlawfully copying, reproducing, and distributing files in violation of the copyright laws of the United States. A broad range of copyrighted albums, audiovisual files, photographs, software, and other forms of media are available for illegal reproduction and distribution via the BitTorrent protocol.

23. Efforts at combating BitTorrent-based copyright infringement have been stymied by BitTorrent's decentralized nature. Because there are no central servers to enjoin from unlawfully distributing copyrighted content, there is no primary target on which to focus anti-piracy efforts.

Indeed, the same decentralization that makes the BitTorrent protocol an extremely robust and efficient means of transferring enormous quantities of data also acts to insulate it from anti-piracy measures.

24. Plaintiff has advised and represented many clients throughout the country who have been victims of copyright infringement conducted via the BitTorrent protocol. Plaintiff has worked to seek monetary damages, injunctive relief, and other, related relief to curb and compensate rampant infringement via BitTorrent. Because of the vast number of users who use BitTorrent to infringe on a particular work, Plaintiff has represented clients in litigation against a large number of defendants whose names are unknown at the start of litigation. Plaintiff typically sought the court presiding over the cases to allow the production of identifying information for the users, and, consistent with the strong judicial preference for settling claims at every stage of the American judicial system, sought to settle as many claims as possible, as early as possible in litigation.

25. The identification of BitTorrent users who commit copyright infringement, and the settlement of such claims, appears to have prompted the Defendants to make false and libelous statements against Plaintiff on the Internet. The visceral, vitriolic reactions, described and enumerated below, appear to stem from a sense of entitlement regarding works available via BitTorrent. One would suspect that users of BitTorrent expect complete anonymity when they commit these illegal acts over BitTorrent; the fact that Plaintiff's actions have contributed to uncovering that veil of anonymity, and to holding individuals accountable for their actions, has made Plaintiff the target of repeated defamatory statements. Some individuals seem perturbed by the very statutory regime set forth by the Copyright Act, decrying the \$150,000 statutory damages maximum. Regardless of such opinions, the Copyright Act is an existing, Federal law,

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and Plaintiff's actions have consisted only of enforcing his clients' rights under the purview of the Copyright Act's statutory regime, through availing his clients of the courts of the United States. That Plaintiff has so availed is *not* justification for the vitriolic, defamatory comments to which Defendants have subjected him. In fact, given that Plaintiff has merely acted within the federal courts, and within the statutory regime set forth by Congress, Defendants comments are an affront to the rule of law itself. For present purposes, however, it suffices to establish that their comments constitute a *prima facie* showing of defamation.

COMPUTER HACKING CASES

26. Plaintiff has also represented and advised clients in pursuing civil claims against those who have illegally accessed their computer systems.
27. Hacking is the act of gaining access without legal authorization to a computer or computer system. This is normally done through the use of special computer programming software. This password cracking software repeatedly attempts to guess a password until the correct password is ascertained. The software can attempt a great number of passwords in a short period of time, sometimes even a million per second, making this type of software very efficient at obtaining a password. Individuals that utilize this type of software are called hackers. Hackers employ various other means to gain unauthorized access to data such as identifying exploitable flaws in database codes.
28. Once a password is obtained, the hacker has unauthorized access to the protected content as long as the password remains valid. Sometimes a hacker will post the hacked password on a hacked password website, making it available to the members or visitors of that website. The hacker may even charge individuals for use of the hacked password and make a profit off of the loss and harm he or she has caused to the website owner or users. There are not necessarily any

limits on how often or by how many people a password can be used, so a single hacked password can potentially allow unauthorized access to significant numbers of individuals.

29. Plaintiff's efforts to identify computer hackers who illegally access and remove property and/or information from its clients' websites, and the settlement of such claims, appears to have prompted the Defendants to make false and libelous statements against Plaintiff on the Internet.

DEFENDANTS' LIBELOUS STATEMENTS

29. Plaintiff has performed a limited review of the Internet communities run and operated by the Defendants. The number of such published comments in these communities is vast. In this section, Plaintiff lists several of the more egregious comments that have been made by the Defendants. Because the Defendants posted the comments referred to in this Complaint under pseudonyms, Plaintiff has no way of knowing, without discovery, the identity of the individual or individuals who wrote and published specific comments. Furthermore, Plaintiff has no way of knowing if multiple individuals use the pseudonym to make comments; or if one writer uses multiple pseudonyms to libel Plaintiff.

30. For those reasons, and because the pseudonyms Defendants used are uninformative, Plaintiff includes the following libelous statements that Plaintiff has observed on the Internet, along with a reference to attached screenshots of the statements. True and correct copies of the screenshots that Plaintiff has gathered in preparing this Complaint are attached hereto as Exhibit A, and made a part hereof. The screenshots are sequentially numbered as "S. 1...S. 2...S. 3..." and so forth.

31. Each of the statements listed below was written, and published, less than one year from the date hereof. Plaintiff lists example comments in the remainder of this section; due to the

many grammatical, spelling, logical and other errors in the comments, Plaintiff includes corrections only where they serve to explain the meaning of certain comments.

32. "it will be even better if Steele slithers out of his hole" (S. 1)
33. "Steele specifically would have no problem bringing a cat, robot, goldfish, plant etc. into court and swearing it's CEO" (S. 2)
34. "Remember, this Copyright Trolling gig is not his first scam. A quick google search and a search of court records across the US can offer a clear picture of what a dirtbag he is and how he's been attempting to ruin lives of many many people his entire adult life." (S. 2)
35. "The side splitter is that SJD's brilliant web site, the artful comments and the united efforts of Does across the land have assured that this is the end of the road for Steele. There are decades of pissed off people who have been ripped off by Steele and couldn't find him and thus, had to just live in the wake of his crimes and try to rebuild. Now they know where he is and they are lining up to participate in putting his butt behind bars where it belongs. Likewise, the people involved with Steele are there by choice and need to be held accountable for their part in the various scams." (S. 2)
36. "Thanks for the comic relief. I needed that laugh and surely I am not the only one. Remember, Does are not the only victims. They are simply the most recent victims. There are the families ruined by "The Steele Law Firm" aka "Chicago Family Law Group", there are the students from the student loan / "The Academy" scam and the property & investment scams just to name a few." (S. 3)
37. "I think that cats are probably the only ones that haven't been brought into this YET. Knowing Steele, it's entirely possible that he'd have Gibbs produce a cat and then try and sue the court / judge / wall paper / Alan Cooper's Ghost for discrimination of the cat." (S. 3)

38. "Yes, he's that nuts. Matter of fact, I would not be at all surprised if he read your comment and headed to the nearest animal shelter and started preparing latest "legal" arguement about how an IP DOES equal a person (a VERY guilty person) AND a flea bitten briefcase gnawing cat DOES equal a CEO!" (S. 3)

39. "Fuck you, Steele, Gibbs, Duffy, and every piece of shit troll out there." (S. 4)

40. "You can be sure thatthe prospect of that fight would stir even more porn industry animosity toward Steele/Lipscomb/Siegal, their gangs and other ringleaders. When pornographers look down on seedy trolls, then trolls are lower than low." (S. 5)

41. "JAIL FOR JOHN!!! JAIL FOR JOHN!!! JAIL FOR JOHN 'THE SHITBAG' STEELE!!!!

Oh happy day....its Christmas in February.....

I'm absolutely giddy in my excitement, to follow this thing to a (hopeful) conclusion and see that overflowing cesspool that is John Steele broke, convicted, and rotting in jail.

Hey John, you ASSWIPE.....your extortion plot is coming to an end. It might have been a good ride for you, living on others hardship and fear, pulling in money and seeing all the pain you inflicted on everyone, so I hope you get even just a fraction of the anxiety and hurt you've caused. It'll probably break you and Gibbsa breakdown or more that is so well deserved.

Enjoy it all John, you huge pile of diseased fecal matter." (S. 6)

42. "In two years of religiously following fightcopyrighttrolls, I've never once disagreed with your opinions, SJD. But today is a first.

I am one of the bloodthirsty. I want Gibbs ans Steele gangraped every day for the next twenty years. The rest of the lot, too.

I ALMOST caved and paid them their ransom, but ultimately decided not to, and the case was finally dismissed. Having seen what they've done to so many others, I truly want them to feel indescribable, inescapable agony. I would never be involved in the inflicting of that pain, but I want it for them nonetheless." (S. 7)

43. "While I was concentrating on John Steele's criminal organization, I'm afraid other trolls have been feeling neglected..." (S. 8)

44. "This is why Steele is forming a company in the US to produce the porn. It's no coincidence this happened right after the bond issue started in CA. He wants to make sure this

doesn't happen again. I can only hope his alcoholism takes its toll on his body sooner than later. The world would be no poorer without him." (S. 9)

45. "Emboldened by the selective permissiveness of the US legal system, John Steele's staggering fraudulent activities continue unabated." (S. 10)

46. "Only on Friday, John Steele poured hogwash on a Minnesota judge that Guava's principle business is 'primarily based and in Nevada, but originated on St. Kitts, with computers in Illinois and Nevada.' It is in Washington now. Right. The truth is that all these artificial companies are most likely located only in the criminal heads of Prenda's principals, and this fact is becoming so obvious that it is almost boring." (S. 11)

47. "There have been no consequences to my being targeted by Prenda law and at this point I'm enjoying watching their downfall and will enjoy it even more when Steele goes to federal pound-me-in-the-ass prison." (S. 12)

48. "Steele can't go to the bathroom without breaking a couple laws on the way." (S. 13)

49. "The word 'Prenda' was not born at that time in the criminal heads of Steele and Hansmeier." (S. 14)

50. "So far, John Steele's criminal organization has been somewhat successfully integrating three areas out of four" (S. 15)

51. "Ultimate bottomless greed did not let criminal masterminds sleep. Porn producers / initial copyright holders still require their cut and they are a hassle to deal with. Therefore, not surprisingly, John Steele decided to forge the missing link and hired a director and performers to film and subsequently license his own pornography. Of course I oversimplify, and greed is definitely not the only motivation: see a brilliant comment embedded at the bottom of this post." (S. 16)

52. "As an anonymous commenter precisely described the situation after John's plans became obvious,

'It shows that the crook is now clearly involved at the very root of the scam. Directly involved in the MAKING of the smut that is soon to be licensed to AF Holdings or Ingenuity 13 or (insert new sham offshore LLC name here). Soon this newly produced smut will have a registered copyright, and be immediately seeded into honeypot torrents, and immediately monitored by the seeder (6881 Forensics LLC, or whatever they will call themselves since they cannot be found to be officially a licensed business either) for 'OMG! Copyright Infringement!'" (S. 16)

53. "I ahve to wonder why no statE AG's have looked into Prenda/Duffy/Steele/Gibbs activities or even the FBI as these seem to be criminal on my opinion. I think we all grew up with an imaginary friend as a child , however it almost seems that Steele might be still conjuring

them up. Well at least when John lands behind bars, he will have all his imaginary friends and CEO's to keep him company" (S. 17)

54. "I think that John Steele has finally found a way to vindicate me: the amount of scams he conceives is so high, the brazenness is so staggering that I may get seriously ill from writing that much about this unpleasant man and his co-gangsters. No single day passes without a new record low that this gang registers on their way down." (S. 18)

55. "In other words, this law is a cousin of Florida's Pure Bill Of Discovery, heavily exploited by both John Steele's and Keith Lipscomb's Mafias." (S. 19)

56. "Last, but not least: abusing the law is Pennsylvania is one of the stupidest things John Steele's hubris can conceive: there are certain superior attorneys there who will have a field day with John's ill attempt to defraud justice, and they will take the matter as close to personal as their genuine professionalism allows." (S. 20)

57. "Steele is never going to quit, and I've lost faith in any criminal proceedings unless we are talking years down the road.

Sure his success rate is going down in getting info from subpoenas, and I'd bet his settlement rate continues to plummet, mainly because of the light SJD continues to shine on his operation.

But, this guy and his mafioso will never quit. The only people with the power to really slow him down at this junction is the ISPs. Notice this little test lawsuit only included Verizon? They didn't want to test comcast, especially in Comcast's own backyard. I wish the ISPs would step up more often. Their current participation seems bi-polar at times.

When criminal proceedings finally come it will be one of those things where the legal community looks back and says, how did this continue for so long, with so much damage... Yet here was this website documenting the activities the whole time.

This cockroach is going to show up in every single state court and federal court in the United States as long as one of him or his gang of trolls has a law license." (S. 21)

58. "Alan Cooper goes on offensive, sues John Steele and his shakedown entities" (S. 22)

59. "It was a bad day for Steele, who appeared in the courtroom along with his partner in crime Paul Hansmeier" (S. 23)

60. "I said it was a bad day for Steele, but this narcissist megalomaniac probably thought it went brilliantly" (S. 24)

61. "Seems like an appropriate time to add something that doesn't seem to have made it's way back here after appearing on SJD and Jane Justice's Twitter feeds. Apparently Steele was involved in a student loan scam for a fraudulent IT degree mill in Florida. Jane claimed to have

found records that tied it to our John Steele, and I found this additional complaint online that mentions a John L. Steele specifically:

<http://www.ripoffreport.com/computer-training-education/the-academy-the-next/the-academy-the-next-step-scho-pf7p6.htm>

Reinforces the fact that this guy has only been emboldened by the permissiveness of the American justice system. I think we all assumed that Steele's scamming started with copyright trolling and was basically a legal if unethical scheme driven by a guy with too much ego who got carried away taking it further and further into the realm of actual fraud. But it's starting to look like Steele is a serial, career fraudster and the lack of consequences for his behavior thus far goes a long way to explain his attitude.

Says a lot about the legal profession that after this guy got his taste for ripping people off he decided to go to law school to shift his career into the next gear. This POS needs to be in jail." (S. 25)

62. "Paging Mr Steele to the white curtsey electric chair..."

Paging Mr Steele to the white curtsey electric chair...

MUHAHAAHAHAHAH!" (S. 26)

63. "I was incorrect about John Steele. I kept thinking every man has some shred of decency within them somewhere. Not so in this case. He's a combination of evil and darkness all in the same sack." (S. 26)

64. "That's just the Steele way! Threats! Threats! Threats! Most Does had the good fortune of NOT having an in person encounter with Steele. I assure you, one cannot fully appreciate what a foul piece of garbage Steele is until being face to face with him. The threats, bullying, pathological lying, extortion isn't just something he does – it's who he is to the core. It's amplified in person." (S. 27)

65. "All that is missing in the definition below is a picture of our beloved Buffy the troll slayer.. John, it has been a long road, but anyone with half a brain knew the house of cards would eventually fall. I never knew it would be this interesting and dramatic though.

Narcissistic personality disorder

Narcissistic personality disorder is a condition in which people have an inflated sense of self-importance and an extreme preoccupation with themselves.

Causes, incidence, and risk factors

The causes of this disorder are unknown. An overly sensitive personality and parenting problems may affect the development of this disorder.

Symptoms

A person with narcissistic personality disorder may:

React to criticism with rage, shame, or humiliation

Take advantage of other people to achieve his or her own goals

Have excessive feelings of self-importance

Exaggerate achievements and talents

Be preoccupied with fantasies of success, power, beauty, intelligence, or ideal love

Have unreasonable expectations of favorable treatment

Need constant attention and admiration

Disregard the feelings of others, and have little ability to feel empathy

Have obsessive self-interest

Pursue mainly selfish goals" (S. 28)

66. "Yeah I've been saying that since 2011. I just don't want to directly state that someone is mentally ill as I am not a mental health professional nor have I ever personally dealt with Steele. He does have all of the signs and I KNOW the signs, I have an ex who has diagnosed NPD." (S. 29)

67. "The house of cards built by the crooks (Paul and Peter Hansmeier, John Steele, Paul Duffy, Brett Gibbs, Michael Dumas) suddenly collapsed, implicating both the known scam artists and 'defense' attorneys — Adam Urbanczyk, Bernard Fuhs and Jennifer Dukarski." (S. 30)

68. "This on the same day as the revelation that John Steele's previous career was running a student loan scam. It was on SJD's Twitter earlier, I think there was some uncertainty over whether it's really our John Steele, but I found an additional complaint that mentions a John L. Steele as owner of the scam:

<http://www.ripoffreport.com/computer-training-education/the-academy-the-next/the-academy-the-next-step-scho-pf7p6.htm>

<http://www.ripoffreport.com/computer-training-education/the-academy-of-ft-la/the-academy-of-ft-lauderdale-pdb2b.htm>

This guy is more disgusting than even we thought." (S. 31)

69. "Yeah, he must have sobered up (again)... How is he still allowed to practice law is beyond me. The world would be no poorer if he just ceased to exist." (S. 32)

70. "In the meantime, John Steele discovered a new concept of judicial masturbation: a one-party lawsuit. Seriously. We all know how Prenda crooks have been doing a hard work of depriving people a say in the court, the very people they rape (again, in a judicial sense). First, scam artists argued that since subpoena is issued to an ISP, John and Jane Does have no standing to quash it. Didn't work. Then a new trick was pulled out of the bag: to issue a subpoena not from a jurisdiction where a lawsuit is filed — with a sole goal to confuse John and Jane Does, as well as judges, making it unclear what court they should file their motions to quash with. Admonished by a couple of judges, trolls did not give up and came up with a concept of "co-conspirators" (not defendants — no standing), masking a mass shakedown lawsuits as single-defendant ones... If only this creativity was used to serve the society, not to rob it!

As the culmination of this crookery, John Steele (using an East Coast goon Daniel Ruggiero as a mouthpiece) declared that the sole defendant he is suing had no standing. I'm not joking." (S. 33)

71. "Two of our favorite attorneys, Dan Booth and Jason Sweet, have delivered a blow to Steele's megalomaniacal march of naked kings." (S. 34)

72. "It's not a secret that John Steele has a drinking problem, but I did not know that John is already reached the delirium tremens phase." (S. 35)

73. "knowing Steele and his drunken rants for almost 2 years, no: this guy is full of it. Knowing his narcissism, I'm convinced that he wouldn't pull a serious strategic trick for such a long time. No way." (S. 36)

74. "...one of the vilest porn copyright trolls of today, John Steele" (S. 37)

75. "I plan to use this text to contact other big name produces (PHE, Inc., for example), who recently jumped on the trolling wagon possibly after listening to sweet speeches of scum lawyers — such as John Steele, Keith Lipscomb or Gill Sperlein, and did not think well about both apparent immorality and inevitable negative consequences of the awful decisions to employ the said scumbags." (S. 38)

76. "In the Forbes' article, John Steele bragged that 'he files 20 lawsuits a month, and would like to increase this to 300.'

Those of us, who know this miserable individual, did not believe a single word. Moreover, I speculated that the blizzard of individual lawsuits was the last grand bluff, last attempt to extort ransom payments before abandoning the sinking ship." (S. 39)

77. "Sure Steele and his goons still can make an effort and heave a couple of summons" (S. 39)
78. "the majority of undertakings by Steele and Hansmeier are tainted with fraud, so there is a viable chance to unearth another scandal." (S. 40)
79. "But seeing as we are now into the third year of Steele's operation, I don't think we should count out his lack of scruples or the justice system's tolerance for him." (S. 41)
80. "I don't think that Steele can be redone into a contributing member of the society: I rarely advocate incarceration, but he needs to be locked." (S. 42)
81. "It makes sense given Steele's goals, motivations, and sociopathy." (S. 43)
82. "Do not forget that the real puppeteer of #copyright trolling scam Prenda is not a narcissistic clown John Steele but Hansmeier brothers." (S. 44)
83. "Steele commences a nationwide extortion racket in their name." (S. 45)
84. "Steele compounds his lies with lies, then gets caught in his lies within lies (I feel like I'm in "Inception" heh), so he lies more. Eventually the stories and bullshit are just so unbelievably insane that any rational person would call bullshit immediately." (S. 46)
85. "Yet because Steele's gang is so deep in the excrements of its own production, I doubt that even a star lawyer can salvage the situation." (S. 47)
86. "They are probably going to end up laughing all the way to the bank as Steele and Gibbs and Lutz and Duffy and co's own idiocy keeps wracking up the legal bills. Too bad they have all that extorted money to pay them with though." (S. 48)
87. "John Steele, during his drunken outbreak of rage thought he vindicated only Erin Russell and her clients." (S. 49)
88. "The name 'Steele' became poisonous as Johns' disrepute spread around the country's federal judicial districts." (S. 50)
89. "I omit Steele's earlier shenanigans: prior to becoming a copyright troll, he was a divorce lawyer. He did not become evil overnight." (S. 51)
90. "But seeing this trend first in Duffy/Steele/Lutz in the Nguyen case and now this from Gibbs: it scares the crap out of me to think that these men . . . well, hold the cards that they do. To think that they have come this far without everything catching up to them, makes me ill. It's a good laugh to see Gibbs try to weasel his way out of these questions, but it indicates a deeper pattern, a deeper psychosis that scares me to death. These men have my name and number and

address and the mentality of Ted Bundy. As wonderful as this is to see, I'm not sure I'll sleep tonight." (S. 52)

91. "John Steele and others actively "hunted" for porn copyright holders in order to lure them into a lucrative semi-legal and obviously immoral schemes of monetizing copyright infringement of cheap pornography "works")." (S. 53)

92. "Two companies emerged out of the crooked minds of Paul Hansmeier and John Steele: Ingenuity 13 and AF Holdings" (S. 54)

93. "Steele will be in prison before the end of the year" (S. 55)

94. "Another show to contact to expose this LOW-LIFE STEELE is:

CNBC's 'AMERICAN GREED'

About the Show

American Greed unveils & exposes incredible true cases of scams, schemes & the stories of people who will do anything for money!!

Do you have a story of American Greed? Let us know!

CONTACT US @ <http://www.cnbc.com/id/41235608/>" (S. 56)

95. "Mr. Steele has proven himself a villain by previous actions." (S. 57)

96. "Didn't know he has an ex-wife and son...wonder if the family court judge(s) bumped up the alimony and child support payments when Steele started raking in the millions with his scams?" (S. 58)

97. "Well... I would say that it is a very questionable honor to have any, even most distant business with Mr. Steele: it is rather burdensome to take an emergency shower (the urge is overwhelming!) after being in the same room with this paragon of ethics." (S. 59)

98. "I used to compare trolls to insects and worms, but seeing those tiny organisms living their lives, having their important little places in the universe, I'm embarrassed for being so mean to those insects and worms; it is unfair to compare these living, loving creatures to unnatural, greedy and sleazy ones – Sperlein, Steele, Siegel, Dunlap, Stone, Ford and scores of other trolls." (S. 60)

99. "He drew our attention this year after conspiring with John Steele to run a giant scam in the corrupt St. Clair county of Illinois with the help from a corrupt judge." (S. 61)

100. "and Steele, who, unlike a bone-in-the-tongue Duffy, is capable of lying to judges in a smooth way, attempted to salvage the situation." (S. 62)

101. "I would say that Steele is a fucking crook is the real bad news, but everyone knows it already." (S. 63)
102. "I just can't understand how Steele can act like this. I mean really?! He is THE reason the lawyer profession has a bad name and he couldn't care less. I just don't understand it." (S. 64)
103. "Every time John Steele (or one of his minions) appears at this and DietrollDie's forums, he never fails to mention his intention to hire new lowlifes." (S. 65)
104. "The name 'John Steele' is as toxic as a helping of strychnine." (S. 66)
105. "I do believe Steele is benefiting financially from this and that, although he may be done practicing law, he's not retired from collecting money from this huge scam." (S. 66)
106. "if they are they really stupid enough to ask for a letter of recommendation from John Steele or Paul Duffy...and then show it to someone? I guess if you're dumb enough to get a letter of recommendation from a scumbag then you're stupid enough to actually use it when applying for a job." (S. 67)
107. "Yet if at this moment any of Prenda's criminals — John Steele, Paul Duffy, Joseph Perea, Mark Lutz or any of their 'local counsels gangsters' — were nearby, I honestly don't know if I would be able to restrain myself." (S. 68)
108. "which is no more probable than a discovery of a soul in John Steele, i.e. 0.00001%" (S. 69)
109. "Duffy, much like Steele, has ZERO regard for the wellness of others and the ramifications of his actions, except on his bank account" (S. 70)
110. "Yesterday Steele crawled from under the bridge to puke out a new doze of FUD. He bragged that Prenda has representatives in 35 states. It's a shame he has a hard time funding a scumbag immune to any reputational loss in his own backyard." (S. 71)
111. "Did you hear that? John Steele is coming up with a new way to game the judicial system and defraud citizens! Surprised? Did anyone really hope that robocalling was the final excrement of Steele's voracious greed?

Nope. Certain people have been born to prove that the ethical abyss is bottomless." (S. 72)
112. "it almost seems like the IARDC has given Steele and Duffy a free pass to conduct these monkeyfuck activities as I'm sure there's been hundreds of complaints filed against Steele and Duffy so far. 'Please forward all complaints to the Recycle Bin.'" (S. 73)
113. "To be honest, I'm tired of Steele's games. When I think about all the mingled connections, real and phony, attempts to hide truth and ongoing puke of a desperate evil mind, I

imagine a product of the drain rodding: tangled hair mixed with grease. The good thing is that the rodding is underway, and soon we will forget about the sewer smell Prenda." (S. 74)

114. "it is very plausible, especially if you read Nick's article and notice the role Alpha Law Firm plays in Steele's criminal activity, and I hope that IRS and/or FBI will be checking this lead soon." (S. 74)

115. "Note that a 'reputable' lawfirm Alpha Law erased its website: Steele's accomplice in extortion, Steve Jones, erased the website of his allegedly forensic company "Arcadia Security" too. An expected behavior of desperate idiots?" (S. 74)

116. "No doubt, Steele's evil mind and Jones's arrogant irrationality work around the clock to produce more sleaze to lubricate their way through the law. Yes, not even around, but brazenly through — thanks to one of the most corrupt judicial districts in the US!" (S. 75)

117. "Apparently I was overoptimistic: this gentleman has heard again from the crooks, which provoked an expected result. I simply fail to understand a masochist Steele, who keeps deliberately inviting pain into his ass." (S. 76)

118. "Prenda law, one of the sleaziest law firms in the US history, a brainchild of a divorce-lawyer-turned-copyright-troll John Steele" (S. 77)

119. "In other words, as automating legal threats is probably unprecedented, Steele finally loudly proclaimed that he and his 'law firm' rather belong to the crooked world of scammers, spammers and debt collectors than to the sophisticated legalese-speaking crowd. We knew that from the day one, but it is always nice to hear the confirmation from the subject himself." (S. 78)

120. "IARDC is an organization with a stated goal 'to promote and protect the integrity of the legal profession.' So far, given apparent ostrich position when it comes to copyright trolling, IARDC deserves a solid B-. To the best of my knowledge (and according to John Steele's words), many people complained to this organization, pointing to John Steele's obvious disregard of ethics and immense harm to the reputation of the legal profession that he and his firm inflicts; nonetheless those complaints were either ignored, or declined². Probably prior to caring about the legal profession as a whole, IARDC should take care of its own integrity. I hope that the current event is a good (and maybe a critical) opportunity to crash trolls, as IARDC's foreign colleagues, British regulators, did recently. If IARDC remains silent this time, many, including legal professionals, overwhelming majority of whom unambiguously condemns and despises the plague of torrent 'litigation campaign,' may perceive it really badly." (S. 79)

121. "Actually, I do not know what is worse: a careful troll who quietly terrorizes population and keeps low profile, or someone like John Steele, who, being emboldened by regulators' indifference (which is mistakenly perceived as approval), earlier or later loses the sense of reality

and commits irreversible and self-destroying actions that are too gross to be ignored even by hard-butted IARDc bureaucrats." (S. 80)

122. "This lawsuit was ill-conceived by one of the most hated US troll gangs led by John Steele in conspiracy with a well-known pornographer Steve "Lightspeed" Jones" (S. 81)

123. "It may have been pure coincidence, but sometime around the time Graham filed his bar complaint, a new name of a Florida licensed attorney began showing up on the letterhead of Steele|Hansmeier on Florida's demand letters, that of a Florida licensed attorney who, as I found later, was never agreed to participate in the shakedown factory, yet Steele fraudulently used that attorney's identity (surprised?)." (S. 82)

124. "Here's what I see in the very near future: this extortion operation collapsing like a deck of cards and a US Attorney crawling up Steele's ass, mass disbarments (Duffy, Steele, Perea, Gibbs, et. al.) and more countersuits than one can count. So my advice to Lutz, grab it while you can." (S. 83)

125. "I personally know Robert Balzebre... He is indeed a lawyer but has nothing to do with the Troll John Steele... Upon reading this report, I called Robert and he indicated that John Steele used to work for him some years ago... Steele 'ended' his employment with Robert when without Robert's consent, Steele used Robert's letterhead and signature on letter he sent out... Needless to say, this was the last time Steele worked for Robert." (S. 84)

126. "Thanks for this interesting tidbit. That does not contradict anything: Steele and his gangsters were caught lying on the record myriad of times. Nonetheless the fact is fact: Balzebre's name was printed on the ransom letters; if would be nice if Robert Balzebre made an official statement regarding this alleged fraud, or even better, informed the Florida Bar, which closely watches Steele/Prenda and maybe is quite responsive to such information." (S. 85)

127. "Leave John Steele alone! I mean, totally alone. I mean, like on a desert island alone.

I can barely imagine what thoughts, what savage impulses pass through his "mind." Was he a victim of child abuse, perhaps by someone who subjected him to awful, endless porn and emotional pain? That would explain a lot." (S. 86)

128. "Steele is the most insecure lawyer that I ever saw. I talked to a dozen or so attorneys who had a 'pleasure' to communicate with him directly, and all of them described John as an arrogant, insecure, unpleasant, rude and unprofessional asshole. All of them. So after this trolling saga is over I advise John to work as a psychological study object in a clinic: maybe this way he will repair his karma by contributing to the discovery of the anti-douchebag vaccine." (S. 87)

129. "In their heart of hearts, Prenda and Lightspeed (and their semi-human embodiments, Steele and Jones) are already on the run, shooting up the street while riding off with the loot

from the bank — but now they're taking hits, wounded in the saddle, struggling not to fall." (S. 88)

130. "So, if these childish rants are the most serious offenses, Gibbs/Steele most likely simply lie about actual 'death threats'." (S. 89)

131. "I've never encountered a lawyer with such a lack of professionalism as Steele" (S. 90)

132. "If you are going to fight this locally, you need to retain local counsel. The corrupt state court, while adjudicating copyright law,to the best of my knowledge, rules on federal issues without allowing pro se Does a word in the shakedown. A Damn Shame...Sorry about the rant, I am not sure as to the level of corruption in St. Clare but if Steele and Lipscomb are renting down there, the fix is in." (S. 91)

133. "CFAA, unfortunately, does not deal in such nuances. It was a panic reaction to a 'burning issue,' the type of legal fallacy in which Congress and state legislatures frequently indulge. It painted so broadly that it didn't accomplish its original intention and gave legal pirates like Steele the tool he needed for a sophisticate shake-down racket." (S. 92)

134. "Well, welcome to the 'club': you are one of 6,500 victims of the Lighspeed/Steele scam (and 250,000 of similar law abuses). Yes, it is scam, yet technically on the verge of legality." (S. 93)

135. "Here's a thought: If being involved in porn embarrasses your family, perhaps you should choose a different line of work. You have embarrassed your family, not the person who exposes what you do.

And if being a lawyer with no morals or ethics embarrasses your family, this is the choice you made. You have to live with the consequences. I know if I was Mama Steele, I'd be so ashamed of the way my son turned out.

Pissing off thousands of people is probably not wise. There are plenty of vengeful people out there." (S. 94)

136. "the FBI is the last entity that Steele and Jones need to have intruding into their full blown extortion scheme." (S. 95)

137. "It is clear that truth is not your second nature, not third, and not even twentieth. You just cannot help it, lying even where it makes absolutely no sense to lie: John Steele" (S. 96)

138. 109. "OK, first of all, and please take absolutely no offense to this, but I know John Steele (or Paul Duffy, or Mark Lutz, or Joe Perea, or Brett Gibbs...you get the picture) would impersonate someone in a heartbeat to get what they want." (S. 97)

139. "The latter is a John Steele's outfit that has supposedly moved to Florida from Illinois: so lucrative the extortion business was in the sunny state!" (S. 98)

140. "Many thanks to you, John Steele, and to your restless crew of useful arts promoters, for an excellent illustration to your 1.5-year long scam." (S. 99)

141. "It's all going down as we speak. Those who are solidly in the middle of it will be ruined. I'm looking at you, John Steele. Your name and face are as tightly tied to this fear and extortion scheme as Andrew Crossley's in the UK. Ira Siegel, Ken Ford, Leslie Bennett, Keith Lipscomb – they're all early adopters and fellow architects, but their faces aren't as firmly imprinted onto it as yours. I sincerely hope your scheme has netted enough for you to make an early retirement, else you may find yourself in Miami with that cardboard sign saying 'will gargle balls for food'.

Though it would be nice to see each and every slimy lawyer who signs onto this 'shaming for cash' scheme be tarnished from it, the new adopters who sign on as the feeding frenzy falls apart will probably slip quietly away." (S. 100)

142. "You, John Steele, and your co-conspirators are filing suits demanding \$150,000 in compensation for a single consumer-level act of copyright infringement. (A normal person understands that this is a violation on the order of double-parking.) This is under a law you know full well was 100% intended for commercial infringement, not consumer infringement.

By interesting coincidence, the average life savings of the median American is approximately \$150,000.

So what you have been doing is mass demanding entire families' life savings in compensation for the most minor copyright infringement imaginable.

This of course is a *prima facie* monstrous position to take, and the fact that you have asserted this to be your lawful privilege against many thousands of people makes you a monster.

And you are doing it totally blind, too. You know as well as we do that the evidence that you are using is totally insufficient to prove the assertions you make.

We know why you don't take these cases to court – every time a sane 3rd party (e.g. a judge, or a tech reporter) looks at what you are doing, they think you're an ass of the lowest order. 70 year old grandma with an unsecured wi-fi is responsible for a 3rd party downloading a dirty movie? Seriously? 'Transparent extortion scheme' is a phrase that comes to mind.

Why you would expect anyone person would treat you with anything but total contempt and hostility, I can't explain. You should be shunned by society and honest merchants should refuse to do business with you.

Also, you're a bit too clever for your own good. Because you are suing so many people, it is statistically certain that you have sued a great many emotionally unstable individuals with nothing left to lose.

Sleep well, demon. May everyone in your life share your ethics." (S. 101)

143. "I can't wait for Spero to weigh in on the fact that Prenda has used the courts as a extortion marketing tool for settlements. Looks Does!! We filed some individual cases, settle now! They only filed that first group of cases and have stalled since November and not filed others. Steele, Duffy, and Gibbs never intended to litigate these at all. This is disgusting and blatant abuse of the courts and taxpayer money. I can't wait to see what Yuen and the judges do to these clowns. I am not a hateful person but I hope these guys pay for the mental anguish they caused so many of us." (S. 102)

144. "It became so boring to point at Steele's lies. I think everyone will get excited only when an unexpected truth inadvertently escapes his foul mouth." (S. 103)

145. "John Steele = Spineless cuckold." (S. 104)

146. "Do you actually believe that Troll Goodhue??? Or is John Steele feeding you technical dribble that has no basis in fact." (S. 105)

147. "The letter is from the Alpha Law Firm LLC (AKA: Paul Hansmeier), who was/is partnered with John Steele. – Can't get rid of that stink!" (S. 106)

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148. "These pieces of shit are just out to fuck over the common people. I didn't get a lawyer and will be getting buttfucked by the system. Tim Anderson & your cunt undelings, John Steele, Hannsmeir, and any other piece of fucking garbage associated with you scum, FUCK YOU ALL AND I HOPE YOU BURN IN FUCKING HELL. Your mothers should have used a coat hanger to abort your fucking asses. Freedom of speech mother fuckkkkerz! Where the fuck is William Wallace???" (S. 107)

149. "Put the whole thing out on the table and start lining up the people they extorted money from to be repaid, so they can use that money to pay a lawyer for the class action against Steele and the pornographers PERSONALLY.

This abuse of the legal system has gone on to damn long, and the fact they don't even have to prove they have rights to the content before a Judge signs off... shameful." (S. 108)

150. "but then Steele's been stealing Randazza's wins to hold up in his threat letters to scare people into paying the extortion." (S. 109)

151. "It is just the way John Steele and the other Trolls are going about it is nothing more than legal extortion" (S. 110)

152. "And the sociopath loser troll steele just doesn't get it." (S. 111)

153. "One more thing Mr. Putz..... You mentioned you had a good view of John Steele. Was he intoxicated? Did he smell of beer? I bet his speech was slurred and his eyes were glossy. Was he standing straight, or was his balance a little off? Please please please.... answer those questions and be honest." (S. 112)

154. "Steele I'm sure is stocking more away now in his foreign shamfront companies. Hiding \$\$\$ away in offshore shelters. Didn't he see it was time to pick up and just go home?" (S. 113)

155. "Just because you start to name a few Does don't change the facts you are a bottom feeding scum bag (AKA: Copyright Troll)." (S. 114)

156. "I hope everyone noticed judge Wilkins's opinion (footnote 8) on that piece of used toilet paper Steele distributed with ransom letters" (S. 115)

157. "This is nothing more than a Prenda cover for the Steele/Hansmeier operations that stinks of questionable personnel, untested "forensic" software, non-certified forensic/Investigative personnel, unethical behavior, and an incestuous relationships of all parties involved." (S. 116)

158. "I hope you've read 2 latest news on my blog: I would say it is a normal human reaction to think that anyone associated with a career thief John Steele is also a thief." (S. 117)

159. "dealing with Steele understandably marks you as thieves by default." (S. 117)

... 160. "You piece of filth.

I can't wait to see you pay for your part in this scam.

Don't worry, it is coming. This is a criminal racket you are caught up in. I can tell from your responses that you are too stupid to comprehend what's going on, so in that respect Steele chose his mark well (the man is a career criminal, this isn't his first scam in case you didn't know). Don't worry though, you'll figure it out once it's too late." (S. 118)

161. "as far as your guy Steele is involved, wait till the feds get involved." (S. 119)

162. "Steele acts in bad faith all the time...But if someone tries to methodically destroy my reputation and knowingly puts me in a situation where I can't afford fighting back... just to extort valuables from me, that's actionable, and the scumbag should be crashed hard." (S. 120)

163. "Thank you John Steele. You still haven't figured out that each time you post, you only help us. Yes a law firm against the Does, that is impressive. Can't wait to see how you fair against DWT. And John, please stop it with the "Fight Piracy" bit, nobody buys that claim. It is

more accurate to say you were thinking of new ways to make money off unsuspecting new Does." (S. 121)

164. "and to Mr. Steele you are a stain on American Justice using some 'revolutionary' scheme to extort thousands of innocent people (among some guilty no doubt). As with the movie and music industry your attempt to collect will fail miserably, Undoubtedly you have engaged in several illegal attempts to circumvent due process among other nefarious deeds. Be proud though that you have motivated me to become a lawyer so I can fight slime like you." (S. 122)

165. "Poor sleazeball Paul Pilcher! How many times the owner of an illegal¹ porn studio Hard Drive Productions cursed the day when he met a copyright troll John Steele (Prenda Law) and fell for his sweet promises? While this lopsided collaboration brought some dirty money to Pilcher's coffers, this extortion campaign had a sizeable downside for the pornographer." (S. 123)

166. "As for the worst troll lawyers (Steele/Hansmeier and their gang in particular), they went too far and do not deserve such an easy way out; they should be pursued criminally." (S. 124)

COUNT I – LIBEL PER SE
(False Allegations of Criminal Offenses)

167. The allegations contained in the preceding paragraphs are hereby re-alleged as if fully set forth herein.

168. Defendants made the statements set forth in Paragraphs 31 through 166, as well as a vast number of similar statements, posted to the same and similar Internet sites. Those statements remained on those sites until at least shortly before the filing of this Complaint, and thus are still, as of the date hereof, being published without restriction to any person in the world with an Internet connection who visits those unrestricted sites.

169. Many of the statements set forth in Paragraphs 31 through 166 falsely allege that Plaintiff has committed criminal offenses. Among other things, and as set forth therein, one or more Defendant wrote, and published to third parties, statements that Plaintiff was engaged in a "scam", "extortion", "criminality", and "fraud"; that Plaintiff is a "crook"; that Plaintiff engaged in "blackmail" and an "extortion scheme"; that Plaintiff is "crooked"; that Plaintiff engaged in "extortion acts", "extortion scheme", and "extortion campaign"; that Plaintiff has committed, or

plans to commit perjury; that Plaintiff has suborned, or plans to suborn perjury; that Plaintiff has conspired with courts to engage in corrupt practices; that Plaintiff participates in "criminal organization"; that Plaintiff is a "criminal mastermind"; that Plaintiff runs a "sophisticate shakedown racket"; that Plaintiff is part of a "mafia"; that Plaintiff should be sent "to the white curtsey electric chair"; that Plaintiff deserves to be imprisoned; that Plaintiff's not having yet been imprisoned is a reflection of the corruption of the justice system; that Plaintiff has "the mentality of Ted Bundy", a mass murderer"; that Plaintiff has attempted to evade taxation by the Internal Revenue Service; that Plaintiff is a "thief", a "career thief", and that "anyone associated with a career thief John Steele is also a thief"; that Plaintiff "can't go to the bathroom without breaking a couple laws on the way"; that Plaintiff is caught up in "a criminal racket"; that Plaintiff will attempt to prostitute himself for food; that Plaintiff has "engaged in several illegal attempts to circumvent due process"; that Plaintiff has committed identity theft; and that Plaintiff is part of a "gang" committing illegal acts.

170. Defendants' false statements accusing Plaintiff of criminal offenses generally, and specific criminal offenses such as extortion, blackmail and fraud, are libelous *per se*.

171. Defendants made those statements with either knowledge of their falsity, or in reckless disregard of the truth. Plaintiff is not a public figure. Nevertheless, in many of the statements listed herein, Defendants admitted that they were making false statements with actual malice, for the express purpose of damaging Plaintiff's business reputation.

172. Defendants' false and defamatory statements that Plaintiff has committed criminal offenses has caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages. Furthermore,

Defendants' malicious conduct was facially motivated by ill will, hostility, and intent to harm Plaintiff, warranting punitive damages under Florida law.

COUNT II – LIBEL PER SE
(Exposing Plaintiff to hatred, ridicule, or contempt)

173. The allegations contained in the preceding paragraphs are hereby re-alleged as if fully set forth herein.

174. Defendants made the statements set forth in Paragraphs 31 through 166, as well as a vast number of similar statements, posted to the same and similar Internet sites. Those statements remained on those sites until at least shortly before the filing of this Complaint, and thus are still, as of the date hereof, being published without restriction to any person in the world with an Internet connection who visits those unrestricted sites.

175. Many, if not all, of the statements set forth in Paragraphs 31 through 166 expose Plaintiff to hatred, ridicule, and contempt. Among other things, and as set forth therein, one or more Defendant wrote, and published to third parties, statements that Plaintiff "slithers out of his hole"; that Plaintiff "is a dirtbag" who has been "attempting to ruin lives of many people his entire adult life"; that "there are decades of pissed off people who have been ripped off by" Plaintiff; that Plaintiff has ruined families through his divorce law practice; that Plaintiff has defrauded students via a student loan scam; that Plaintiff is a "piece of shit troll", "a seedy troll", and "one of the vilest porn copyright trolls of today"; that Plaintiff is lower than insects and worms; that Plaintiff is a "sociopath", "narcissist", and "megalomaniac"; that Plaintiff has a "drinking problem", has "reached the *delirium tremens* phase", has engaged in "drunken outbreak of rage" and "drunken rants"; that "the name Steele became poisonous"; that "[Plaintiff] will be in prison before the end of the year"; that Plaintiff is a "low-life" who should be exposed on CNBC's "American Greed"; that Plaintiff has "proven himself a villain"; that one

what [he wants]”; that Plaintiff “may find [himself] in Miami with that cardboard sign saying ‘will gargle balls for food’”; that Plaintiff is a “monster”; that Plaintiff is “an ass of the lowest order”; that “it became so boring to point at Steele’s lies”; that “John Steele = Spineless cuckold”; that Plaintiff should “BURN IN FUCKING HELL”, that his mother “should have used a coat hanger to abort [his] fucking [ass]”, that Plaintiff is “a piece of shit...just out to fuck over the common people”, and that Plaintiff is “a piece of fucking garbage”; that a fitting outcome for Plaintiff would be: “JAIL FOR JOHN!!! JAIL FOR JOHN!!! JAIL FOR JOHN ‘THE SHITBAG’ STEELE!!!! I’m absolutely giddy in my excitement, to follow this thing to a (hopeful) conclusion and see that overflowing cesspool that is John Steele broke, convicted, and rotting in jail”; that Plaintiff should be subject to a class action lawsuit; that Plaintiff must have appeared in court “intoxicated”, “smell[ing] of beer”, with “glossy” eyes; that Plaintiff is a “bottom feeding scum bag”; that Plaintiff is a “piece of filth”; that Plaintiff is a “career criminal”; that Plaintiff is “a stain on American Justice”; that Plaintiff has no “shred of decency” and is “a combination of evil and darkness all in the same sack”; that the probability of “a discovery of a soul in John Steele [is] 0.00001%”; and that Plaintiff has “undoubtedly...engaged in several illegal attempts to circumvent due process among other nefarious deeds”.

176. Defendants’ false statements clearly expose Plaintiff to hatred, ridicule, and contempt, and are thus libelous *per se*.

177. Defendants made those statements with either knowledge of their falsity, or in reckless disregard of the truth. Plaintiff is not a public figure. Nevertheless, in many of those statements, Defendants admit that they were making false statements with actual malice, for the express purpose of damaging Plaintiff’s business reputation.

178. Defendants' false and defamatory statements, which have exposed Plaintiff to hatred, ridicule, and contempt, have also caused significant actual damages, including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients, and other damages. Furthermore, Defendants' malicious conduct was facially motivated by ill will, hostility, and intent to harm Plaintiff, warranting punitive damages under Florida law.

COUNT III – LIBEL PER SE
(False Allegations Imputing Lack of Ability in Plaintiff's Profession)

179. The allegations contained in the preceding paragraphs are hereby re-alleged as if fully set forth herein.

180. Defendants made the statements set forth in Paragraphs 31 through 166, as well as a vast number of similar statements, posted to the same and similar Internet sites. Those statements remained on those sites until at least shortly before the filing of this Complaint, and thus are still, as of the date hereof, being published without restriction to any person in the world with an Internet connection who visits those unrestricted sites.

181. Many of the statements set forth in Paragraphs 31 through 166 falsely allege that Plaintiff lacks professional ability. Among other things, and as set forth therein, one or more Defendant wrote, and published to third parties, statements that Plaintiff appears in Court while intoxicated; that Plaintiff's practice of his profession is criminal in nature; that "how [Plaintiff] is still allowed to practice law is beyond me"; that Plaintiff's "disrepute spread around the country's federal judicial districts"; that Plaintiff "is THE reason the lawyer profession has a bad name"; that someone would have to be "stupid...to ask for a letter of recommendation from John Steele"; that Plaintiff belongs "to the crooked world of scammers, spammers and debt collectors than to the sophisticated legalese-speaking crowd"; that Plaintiff practices law with a lack of professionalism; and that Plaintiff is a "desperate idiot", "criminal", "crook", and "crooked."

182. Defendants' false statements that Plaintiff lacks ability as an attorney, his profession, are libelous *per se*.

183. Defendants made those statements with either knowledge of their falsity, or in reckless disregard of the truth. Plaintiff is not a public figure. Nevertheless, in many of these statements, Defendants admit they were making false statements with actual malice, for the express purpose of damaging Plaintiff's business reputation.

184. Defendants' false and defamatory statements that Plaintiff wants of ability in his profession has caused Plaintiff significant actual damage including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages. Furthermore, Defendants' malicious conduct was facially motivated by ill will, hostility, and intent to harm Plaintiff, warranting punitive damages under Florida law.

**COUNT IV – TORTIOUS INTERFERENCE WITH CONTRACTUAL
RELATIONSHIPS**

185. The allegations contained in the preceding paragraphs are hereby re-alleged as if fully set forth herein.

186. At all times relevant hereto, Plaintiff was a party to valid and enforceable contracts with third parties. Those third parties included clients that retained Plaintiff to represent them in court or provide them with legal guidance.

187. Some or all Defendants admitted, in the published statements referenced above and in other statements, that they were aware that Plaintiff had such business relationships with his clients.

188. Defendants intentionally engaged in the unjustified inducement of a breach by making false and defamatory statements about Plaintiff. Several Defendants expressly admitted that they published such statements to alienate Plaintiff from his clients.

193. Some or all Defendants admitted, in published statements referenced above and in other statements, that they were aware that Plaintiff had a reasonable expectation of entering into valid business relationships with prospective clients

194. Defendants intentionally engaged in unjustified interference with these prospective business relationships, preventing Plaintiff's legitimate expectancies from ripening into valid business relationships.

195. Defendants' false, defamatory statements injured Plaintiff's reputation, interfering with these prospective business relationships.

196. Defendants' false and defamatory statements discouraged clients from entering into business relationships with Plaintiff because of the harassment and reputational injury, described above, that Defendants committed with respect to Plaintiff's existing clients. The prospective clients declined to enter into business relationships with Plaintiff out of fear that doing so would subject them to such harassment and reputational injury.

197. Defendants' false and defamatory statements have caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages. Furthermore, Defendants' malicious conduct was facially motivated by ill will, hostility, and intent to harm Plaintiff, warranting punitive damages under Florida law.

COUNT VI—CIVIL CONSPIRACY

198. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

199. The Defendants collaborated with one another by planning, coordinating and assisting one another in preparing the defamatory statements that were disseminated to third-parties via the Internet "communities" referenced above. Each Defendant engaged in a concerted action

with other Defendants and yet unnamed individuals to defame and commit other tortious conduct against Plaintiff.

200. Each Defendant who posted false and defamatory comments in connection with this "community" thus conspired with other Defendants to commit defamation and other tortious actions against Plaintiff.

201. In furtherance of this civil conspiracy, Defendants and others committed overt tortious and unlawful acts by making and publishing to third parties false and defamatory statements about Plaintiff, and each was a willful participant in this joint activity. Furthermore, Defendants' malicious conduct was facially motivated by ill will, hostility, and intent to harm Plaintiff, warranting punitive damages under Florida law.

202. As a proximate result of this conspiracy, Plaintiff has been damaged, as is more fully alleged above.

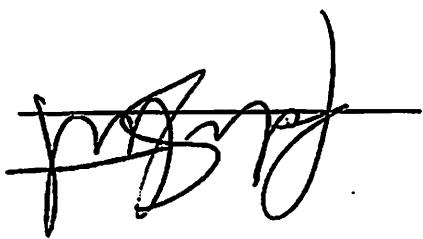
JURY DEMAND

203. Plaintiff hereby demands a jury trial in this case.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests Judgment and relief as follows:

- A) Judgment against Defendants that they have committed the torts set forth in each of Count I through Count VI hereof;
- B) Judgment in favor of the Plaintiff and against Defendants awarding Plaintiff attorneys' fees, litigations expenses (including fees and costs of expert witnesses), and other costs of this action;



By:

John L. Steele

DATE: February 24, 2013

circumstances.

and injunctive relief, or other equitable relief, as may be just and warranted under the

D) Judgment in favor of the Plaintiff against the Defendants, awarding Plaintiff declaratory

hostility, and intent to harm Plaintiff;

damages for Defendants' malicious conduct, conduct that was basically motivated by ill will,

C) Judgment in favor of the Plaintiff and against Defendants awarding Plaintiff punitive